

**FILED****APR 18 2013**

THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA, )

Plaintiff, )

vs. )

DOUGLAS T. KNOWLES, )

Defendant. )

CRIMINAL NO.

13-30078-MJR

Title 18, U.S.C. §513

**INDICTMENT**

**THE GRAND JURY CHARGES:**

**Introduction to the Offense**

1) Title 18, United States Code, Section 513 provides in relevant part that it is a federal crime to make, utter or possess a forged security of a State or a political subdivision of a State with the intent to deceive another person, organization, or government. Under the statute, "forged" means a document that purports to be genuine but is not because it has been falsely altered, completed, signed, or endorsed, or contains a false addition thereto, or insertion therein, or is a combination of parts or two or more genuine documents. Under the statute, "security" is defined to include a check.

2) At all times relevant, the Village of Washington Park, Illinois, was a political subdivision of the State of Illinois, located in St. Clair County, within the Southern District of Illinois. According to the Village's website, Washington Park was first incorporated on December 15, 1923. It is an impoverished local government having unsuccessfully sought federal bankruptcy protection in 2010.

3) In December of 2012, **DOUGLAS T. KNOWLES**, the Public Works/Street Superintendent for the Village of Washington Park had improperly obtained a Village check from the Village Administrator of the Village of Washington Park and had forged the endorsement of the Mayor on the check which he then used to purchase a stove for his private residence.

4) On December 26, 2012, **DOUGLAS T. KNOWLES** purchased and picked up a gas range from Gil Klein TV & Appliance, Inc., a/k/a Klein's Brand Source, 10338 Lincoln Trail, Fairview Heights, Illinois. The gas range was purchased by **KNOWLES** in the name of the Village of Washington Park and he presented for payment a Village of Washington Park check purported to be signed by the Mayor of the Village of Washington Park.

5) On or about January 3, 2013, the check was returned by a financial institution as an account closed check.

6) On or about January 3, 2013, the store notified the Village of Washington Park of the account closed check.

### **COUNT 1**

#### **Possessing and Uttering a Forged Check of the Village of Washington Park**

1. Paragraphs 1 through 6 are realleged and incorporated herein.
2. On or about December 26, 2012, in St. Clair County, within the Southern District of Illinois,

**DOUGLAS T. KNOWLES,**


defendant herein, did knowingly possess and utter a forged security, a check of the Village of Washington Park, Illinois, with the intent to deceive another person.


All in violation of 18 U.S.C. § 513.

A TRUE BILL



FOREPERSON

  
STEPHEN R. WIGGINTON  
United States Attorney

  
NORMAN R. SMITH  
Assistant United States Attorney

Recommended bond: \$15,000 unsecured